

Lance J.M. Steinhart, P.C.

Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

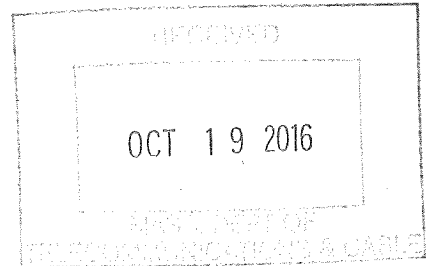
Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

October 18, 2016

VIA OVERNIGHT DELIVERY

Sara Clark, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118



Re: i-wireless, LLC; DTC 12-5

Dear Ms. Clark:

Enclosed please find an original and five (5) copies of i-wireless, LLC's Revised Supplement to Petition for Designation as an Eligible Telecommunications Carrier.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me.

Please acknowledge receipt of this filing by returning the duplicate copy of this letter in the enclosed, self-addressed envelope. Thank you.

Respectfully submitted,

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for i-wireless, LLC

Enclosures

cc: Sam Bailey
DTC 12-5 Service List

**BEFORE THE
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Petition of i-wireless, LLC
for Designation as an Eligible Telecommunications
Carrier in the Commonwealth of Massachusetts

)
)
)
)
)

D.T.C. 12-5

**I-WIRELESS, LLC'S REVISED SUPPLEMENT TO PETITION FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

Attorneys for i-wireless, LLC

October 18, 2016

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	UPDATES.....	2
	A. ETC Designations	2
	B. Proposed Lifeline Offering	3
	C. Enrollment.....	4
	D. Advertising.....	5
	E. Requested Service Area	6
	F. Compliance with Department Requirements	7
	G. Financial and Technical Capability	7
	H. Acquisition of Massachusetts Lifeline Customers.....	9
III.	THE COMPANY WILL COMPLY WITH THE FCC’S LIFELINE MODERNIZATION ORDER	12
IV.	DESIGNATION OF I-WIRELESS AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST	13
V.	CONCLUSION.....	15

TABLE OF EXHIBITS

	<u>Exhibit</u>
Certification of John Willis, Chief Operating Officer of i-wireless, LLC.....	1
Updated Proposed Lifeline Offering.....	2
Updated Lifeline Application & Certification Form	3
Updated Sample Advertisements	4
Coverage Area Map	5
Updated Wire Center List	6

**BEFORE THE
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Petition of i-wireless, LLC
for Designation as an Eligible Telecommunications
Carrier in the Commonwealth of Massachusetts

)
)
)
)
)

D.T.C. 12-5

**I-WIRELESS, LLC'S REVISED SUPPLEMENT TO PETITION FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

I. INTRODUCTION

i-wireless, LLC (“i-wireless” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹ and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Massachusetts Department of Telecommunications and Cable (“Department”), hereby submits this revised Supplement (“Supplement”) to its Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the Commonwealth of Massachusetts in order to update the record with changes due to the passage of time and to discuss the implication of its acquisition by Sprint and the transfer of Virgin Mobile Lifeline subscribers to i-wireless. This revised Supplement is intended to replace, in its entirety, the version originally submitted on September 23, 2016.

As demonstrated by the original Petition and instant Supplement, i-wireless meets all the statutory and regulatory requirements for designation as an ETC, including the requirements outlined in the FCC’s *Lifeline Reform Order*.³ Rapid grant of i-wireless’ request, moreover, would

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42,

advance the public interest because it would enable the Company not only to commence much needed Lifeline service to low-income Massachusetts residents as soon as possible, but also to acquire the Lifeline customers of Virgin Mobile USA, L.P. (“Virgin Mobile”), as more fully described herein. The acquisition of over 80,600 Virgin Mobile Massachusetts Lifeline customers is time-sensitive and will not be possible to do seamlessly without the Department’s grant of ETC designation to i-wireless. Accordingly, the Company respectfully requests that the Department expeditiously approve the Company’s request for ETC designation.

II. UPDATES

A. ETC Designations

i-wireless has been designated as an ETC in additional states since filing its original Petition. Currently, i-wireless has been designated as an ETC by state public utility commissions in Arkansas, Arizona, California, Colorado, Georgia, Idaho, Iowa, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Washington, West Virginia and Wisconsin, and by the FCC in Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia.⁴ i-wireless currently has ETC applications pending in Hawaii, Massachusetts, New Jersey, and South Dakota.

WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”).

⁴ See *In the Matter of Federal-State Joint Board on Universal Service, i-wireless, LLC Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia*, WC Docket No. 09-197, Order, DA 12-934 (rel. June 13, 2012).

B. Proposed Lifeline Offering

i-wireless will provide Lifeline service under the brand name “Access Wireless.” i-wireless has increased the benefits of its Lifeline offering in anticipation of the minimum service requirements that will soon take effect pursuant to the FCC’s *Lifeline Modernization Order*.⁵ Furthermore, i-wireless proposes to offer an additional Lifeline rate plan beginning December 2, 2016 which will meet the mobile broadband minimum service standards for data usage and speed. As summarized below and in attached Exhibit 2, Lifeline customers will have the choice of one of the following plans:⁶

500 Minute Plan. Eligible customers will receive 500 anytime voice minutes, unlimited text messaging, and 50 megabytes (MB) of data per month at no cost to the consumer.

500 MB Data Plan. Eligible customers will receive 500 MB of data, 100 anytime voice minutes and unlimited text messaging per month at no cost to the consumer.⁷

⁵ See *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (“*Lifeline Modernization Order*”), Section III.B.2; see also 47 C.F.R. §54.408. FCC rules regarding minimum service standards will be effective December 2, 2016, which is 60 days after announcement of approval from the Office of Management and Budget (OMB).

⁶ The Company’s Lifeline terms and conditions can be found at www.accesswireless.com. The Company’s retail terms and conditions can be found at www.krogeriwireless.com. i-wireless no longer offers a Lifeline discount on its regular retail bundled voice, text and data offerings; however, the Lifeline rate plan combined with additional airtime “Top Ups,” if needed, exceeds the benefits of the Company’s retail bundled plans.

⁷ i-wireless has an application for Lifeline Broadband Provider (LBP) Designation pending with the FCC, in which i-wireless proposes to offer this broadband plan nationwide subject to the broadband coverage of its underlying carrier (see i-wireless Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier, WC Docket No. 09-197 (filed Oct. 3, 2016)). i-wireless’ pending LBP application should have no effect on the instant proceeding. ETC designation would permit i-wireless to offer service offerings that meet minimum service standards for voice or broadband, whereas the LBP designation would be limited in scope to qualifying broadband offerings. i-wireless has updated its Massachusetts Lifeline offering to include the broadband rate plan, so that the ETC designation will reflect all voice and broadband plans that i-wireless will offer to Lifeline customers in Massachusetts, regardless of whether or not i-wireless has an LBP designation.

i-wireless' Lifeline customers will also receive a free data-capable device that will meet minimum equipment requirements set forth in 47 C.F.R. §54.408(f). Customers can change their plan on their monthly plan date, without penalty, should they determine that another plan better meets their needs or if their needs change. i-wireless does not impose burdensome credit checks or long-term service contracts. Furthermore, i-wireless does not assess charges for activation or connection of service, and the Company's no-cost Lifeline plans include all applicable taxes and fees. i-wireless does not decrement minutes for balance inquiries, and customers may place calls from their handset for free (i.e. no minutes deducted from subscriber's balance) to 911 and i-wireless customer service (via 611 or toll free number) regardless of account balance or activation status. Additional airtime may be purchased over the phone (by calling the IVR or through customer care interface) or online. Airtime cards are sold in a variety of denominations and include a set number of minutes with unlimited text messaging and a preset amount of mobile internet access and picture mail. The chart in Exhibit 2 provides details for each card denomination.⁸ i-wireless sends low and depleted balance alerts in the form of a free text message to the customer, and also alerts the customer through a free text message when minutes have been added to their account.

C. Enrollment

i-wireless recognizes the importance of safeguarding the USF. In addition to providing required disclosures to and collecting required information and certifications from applicants on the Lifeline application form (an updated draft of which is attached hereto as Exhibit 3),⁹ and

⁸ i-wireless may run promotions from time to time to increase the amount of minutes, texts and/or data included.

⁹ The attached Lifeline application form complies with regulations currently in effect. However, i-wireless is aware of recent FCC rule changes that will affect the Lifeline application form, including revisions to qualifying eligibility criteria. i-wireless will revise its Lifeline application form accordingly prior to December 2, 2016 when the respective rule changes become effective.

verifying consumer eligibility for Lifeline in accordance with FCC rules, the Company will utilize the Universal Service Administrative Company's ("USAC's") National Lifeline Accountability Database ("NLAD"), in accordance with 47 C.F.R §54.404, to verify that Lifeline applicants do not already receive Lifeline service. i-wireless would also use state eligibility database(s) to verify the eligibility of Massachusetts applicants, if made available to the Company. i-wireless utilizes a standard electronic application tool known as the Enrollment Compliance Platform ("ECP") across all states and enrollment methods in order to ensure the highest level of compliance. The Company reviews each application in real time using its internal Review Team. This team, made up of employees that are not paid on a commission basis, verifies the accuracy and consistency of the proof documentation, including proof of eligibility and proof of valid identification, for every application received. The ECP automatically conducts internal and external (e.g., NLAD) system validation checks prior to proceeding with enrollment. Based on the results of the documentation and system checks, the Review Team will either approve or deny the application and a decision is provided to the applicant in real-time.

D. Advertising

i-wireless will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2) of the FCC's regulations and the rules adopted by this Department, and in accordance with the requirements set forth in the *Lifeline Reform Order*.¹⁰ The FCC recently acknowledged that, while the requirement to advertise the availability and price of service is a useful one, the ambiguity of the phrase "media of general distribution" may have placed an unintended burden on carriers.¹¹ Therefore, the FCC sought to

¹⁰ See *Lifeline Reform Order* at Section VII.F.

¹¹ See *Lifeline Modernization Order* ¶ 363.

interpret the phrase to provide further clarity, noting that the provision need not be overly burdensome. The FCC clarified that “Under section 214(e)(1)(B), ‘media of general distribution’ is *any media reasonably calculated to reach the general public* [emphasis added] ...”, citing the example of a Lifeline-only broadband ETC that may offer a service designed for eligible low-income subscribers with hearing disabilities, for which “‘media of general distribution’ may include web advertisements reasonably calculated to reach the relevant community, mail, email, or other text-based methods of advertising.”¹²

In line with the FCC’s interpretation referenced above, i-wireless will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, using methods which may initially include print advertisements and online media, but are subject to change based on the Company’s analysis of what methods are reasonably calculated to reach the general public and/or relevant community depending on the offering, location, point in time, etc. i-wireless may, for example, also promote the availability of its Lifeline offerings by distributing brochures at various state and local social service agencies, and/or partnering with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline services. *See* attached Exhibit 4 for updated sample advertisements.¹³

E. Requested Service Area

i-wireless requests designation as an ETC throughout its entire network territory in Massachusetts, which is wherever its underlying carrier, Sprint, has network coverage, as such coverage may be expanded in the future. *See* attached Exhibit 5 for a map of the Company’s

¹² *See Lifeline Modernization Order* ¶ 364.

¹³ i-wireless will update its advertisements before launch in Massachusetts with the current proposed offering, i.e. 500 minutes with unlimited texting and 50 MB of data. In addition, i-wireless will revise its advertisements to comply with recent FCC rule changes prior to December 2, 2016 when the respective changes become effective.

current network coverage area in Massachusetts, and attached Exhibit 6 for the corresponding wire center list intended to replace the wire center list provided in Exhibit 9 of the Company's original Petition.¹⁴

F. Compliance With Department Requirements

i-wireless hereby re-asserts its willingness and ability to comply with the rules and regulations that the Department may lawfully impose upon the Company's provision of service as an ETC. i-wireless is aware of and will comply with the Massachusetts Lifeline Requirements adopted on August 1, 2014.¹⁵ Moreover, i-wireless agrees to comply with any additional commitments to which Virgin Mobile agreed and/or conditions of Virgin Mobile's ETC designation that are not already required by the Massachusetts Lifeline Requirements and which the Department deems still necessary and applicable.

G. Financial and Technical Capability

Lifeline ETCs must be financially and technically capable of providing the supported services and FCC guidance indicates that one factor in that consideration is whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.¹⁶ i-wireless remains financially and technically capable of providing Lifeline service (and will only improve its financial and technical capabilities with its acquisition by Sprint), which it has done for over four years throughout the United States.

¹⁴ Because i-wireless provides service using the Sprint wireless network, the Company's service area is congruent with that of Virgin Mobile, whose designated service area was based upon the coverage map provided in Exhibit 2 to Virgin Mobile's Written Objections & Responses to Information Requests Propounded by the Department in D.T.C 10-11.

¹⁵ *Investigation by the Department on its Own Motion into the Implementation in Massachusetts of the Federal Communications Commission's Order Reforming the Lifeline Program*, D.T.C. 13-4, *Order Implementing Requirements* (Aug. 1, 2014), see Appendix.

¹⁶ *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, DA 12-314 at p. 3 (Feb. 29, 2012).

i-wireless does not expect that its financial and technical ability to provide Lifeline service will be materially compromised by the Notice of Apparent Liability for Forfeiture (“NAL”) issued to i-wireless by the FCC on November 1, 2013. This misguided and unfounded NAL, which is similar to those received by a dozen other Lifeline providers, alleged that i-wireless failed to comply with FCC rules by requesting and receiving reimbursement payments from the federal Universal Service Fund for intra-company duplicate Lifeline enrollments.¹⁷ i-wireless has denied the allegations in the NAL and has requested that it be cancelled.

The basis for the NAL was the USAC’s in-depth validation (“IDV”) review of a sample of months in 2012 and 2013 for eight states to identify intra-company and inter-company Lifeline service duplicates.¹⁸ Of the subscribers included in the eight-state review, USAC claimed to have identified 1,684 intra-company duplicates during the period from October 2012 through April 2013.¹⁹ Even if the alleged duplicates actually were duplicates (which i-wireless disputes), i-wireless was 99.7% effective at identifying and preventing duplicate enrollments. Stated differently, only 0.26% of the total number of customers were alleged to be intra-company duplicates. This miniscule alleged error rate is well within the 1.5% range deemed by Congress to be acceptable for federal benefit programs of this kind.²⁰

¹⁷ An intra-company duplicate occurs when a consumer is provided more than one Lifeline service by a single company. The FCC has not articulated a standard for when differences in subscriber information do or do not render two subscriber accounts to be duplicates. Although i-wireless continues to use a multi-faceted approach to screening for potential duplicate enrollments, duplicates are now screened by Universal Service Administrative Company’s (“USAC’s”) National Lifeline Accountability Database (“NLAD”). i-wireless believes that the vast majority of the duplicates alleged in the NAL would have passed the duplicate screen originally incorporated into the NLAD.

¹⁸ An inter-company duplicate occurs when a consumer is provided Lifeline service by more than one company.

¹⁹ USAC conducted IDV reviews for i-wireless operations in Illinois, Indiana New York, North Carolina, Ohio, South Carolina, Tennessee and West Virginia.

²⁰ See Office of Management and Budget, Circular A-123, Appendix C: Requirements for Effective Estimation and Remediation of Improper Payments, 9 (Oct. 2014).

In the nearly three years since the NAL was issued, notwithstanding recurring outreach by the Company to discuss the matter with FCC Staff, the FCC has taken no further action on the NAL. In the meantime, at least **seven** state commissions have made affirmative decisions to move forward with i-wireless' ETC designation requests, including California after a thorough review of the circumstances and status of the NAL. Each commission has been well aware of the NAL and nevertheless deemed the Company well-qualified to operate as an ETC.²¹

H. Acquisition of Massachusetts Lifeline Customers

i-wireless is awaiting FCC and two state approvals for consummation of a transaction that will allow i-wireless to acquire the Lifeline customers of Virgin Mobile, which the Department designated as an ETC on September 9, 2011. On April 29, 2016, Sprint and i-wireless reached an agreement to combine their resources in a Lifeline wireless services partnership that can respond both competitively and proactively to the FCC's vision for a modernized broadband-focused Lifeline program.²² At closing, Sprint will acquire 70% of the indirect interests in i-wireless.²³ The remaining 30% interest in i-wireless will continue to be held in equal shares by Genie and Kroger, through a newly-formed intermediary holding company.

²¹ These states are: California, Georgia (expansion), Idaho, Nebraska, Oregon, Pennsylvania and Washington. California, in particular, undertook a detailed review of the allegations. Noting that the FCC "has not adopted a threshold for an acceptable level of duplicates" the Communications Division Staff concluded that 1.5% (derived from the *Federal Improper Payments Elimination and Recovery Act of 2010* (IPERA)) would be a reasonable standard and that, measured accordingly, "i-wireless' [] duplicate rate does not rise to the level of a "significant risk" that justifies a denial of their ETC designation request." California Public Utilities Commission Resolution T-17449, pp. 17-18 (Sept. 11, 2014), available at: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M107/K222/107222695.pdf>.

²² See *Lifeline Modernization Order*.

²³ The Parties have filed an application with the FCC in connection with the transfer of control of the i-wireless international section 214 authorization. A copy of the filing (File No. ITC-T/C-20160623-00174) may be accessed at <http://tinyurl.com/zc2c7vy>. The application was deemed approved on July 15, 2016. See *International Authorizations Granted Section 214 Applications* (47 C.F.R. § 63.18); *Section 310(b) Requests*, FCC Report No. Tel-01804, DA No. 16-827 (rel. July 21, 2016).

In support of the proposed partnership, Virgin Mobile will assign its Assurance Wireless Lifeline customer base to i-wireless, including more than 80,600 Assurance Wireless Lifeline subscribers in Massachusetts. Post-close, i-wireless will operate as the provider for wireless local exchange, interexchange, international and broadband Lifeline services to these customers. Advance notice of the assignment will be provided to the Assurance Wireless customers. Sprint, Virgin Mobile and i-wireless will coordinate throughout the process to ensure a smooth transition. Following the assignment, these customers will receive competitive service offerings of minutes and texts equal to or better than the services they previously received from Assurance Wireless.²⁴ Moreover, because both Virgin Mobile and i-wireless rely upon the Sprint network for their services, all of these customers will continue to use the same handsets, have the same coverage area and enjoy the same reliability of service as they did previously.

On October 21, 2011, the FCC granted i-wireless's compliance plan for Lifeline services, which allows i-wireless to provide Lifeline service using resold services rather than providing service over its own facilities. That compliance plan remains in full force and effect today. However, on July 24, 2014, the FCC's Wireline Competition Bureau ("Bureau") released a Public Notice clarifying a footnote in the *Lifeline Reform Order* regarding transfer of ownership or control of an ETC with an approved Lifeline compliance plan, such as i-wireless.²⁵ The Public Notice states that Commission approval is required in advance of transfer of ownership or control of any such ETC.

²⁴ The structure of i-wireless data "top-up" offerings will vary from those available through Virgin Mobile.

²⁵ See *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Lifeline Universal Service Support*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 14-1052 (2014).

Therefore, on June 24, 2016, after discussions with FCC staff, i-wireless filed an Amended Compliance Plan to reflect the proposed transfer of ownership and control to Sprint.²⁶ i-wireless has worked closely with the Bureau on the Amended Compliance Plan and expects action shortly. However, this approval is not required for state approval of ETC petitions, such as in Massachusetts. In the event the Department prefers to issue the ETC designation only after FCC approval of the Amended Compliance Plan, i-wireless respectfully requests that the Department move forward procedurally in the meantime as quickly as possible, so that the transfer of customers from Virgin Mobile to i-wireless is not delayed, ultimately risking service disconnection for thousands of customers.

As mentioned previously, i-wireless cannot seamlessly transfer Virgin Mobile's Assurance Wireless Lifeline customer base in Massachusetts without first being granted ETC designation by the Department. It is important to note that, while i-wireless has an application for LBP designation pending with the FCC, which could be deemed effective as early as December 2, 2016, an LBP designation is limited in scope to broadband Lifeline service. It would not authorize i-wireless to receive Lifeline support for voice service, which is the service that the Assurance Wireless customers in Massachusetts currently have. Specifically, while an LBP designation would allow i-wireless to offer broadband Lifeline offerings in Massachusetts that meet broadband minimum service standards, it would *not* authorize i-wireless to offer its 500-minute + unlimited texts + 50 MB of data Lifeline plan, which is the plan to which Assurance Wireless customers could be seamlessly transferred.

²⁶ See Amended Compliance Plan of i-wireless, WC Docket Nos. 09-197, 11-42 (filed June 24, 2016).

Therefore, in the interest of preventing service interruption or disconnection for more than 80,600 Massachusetts Lifeline subscribers, it is imperative that the Department expeditiously process i-wireless' pending request for ETC designation, and grant such designation without delay.

III. THE COMPANY WILL COMPLY WITH THE FCC'S LIFELINE MODERNIZATION ORDER

The Company is aware that the FCC adopted its *Lifeline Modernization Order* on March 31, 2016. In part, the *Lifeline Modernization Order* marks a considerable step forward with respect to creating a competitive Lifeline broadband program by allowing support for standalone fixed and mobile broadband service, establishing minimum service standards for such broadband and mobile voice services, and implementing a five and one-half year (5 ½) transition, during which time the FCC will gradually increase mobile voice and data requirements and simultaneously decrease voice support levels.

Moreover, the *Lifeline Modernization Order* takes steps to further curb abuse in the Lifeline program by establishing the National Lifeline Eligibility Verifier,²⁷ which transfers the responsibility of eligibility determination away from Lifeline providers, lowering costs of conducting verification, and reducing the risks of facing a verification-related enforcement action. The Company is aware of the compliance requirements set forth in the *Lifeline Modernization Order* and commits to adhere to all obligations provided therein to the extent applicable to the Company, including use of the National Lifeline Eligibility Verifier, once in place, and the revised eligibility criteria and non-usage rules, once effective.²⁸ Further, i-wireless intends to meet the FCC's minimum service standards for Lifeline and to focus on providing mobile broadband Lifeline service.

²⁷ See *Lifeline Modernization Order*, section III.C.

²⁸ See *Lifeline Modernization Order*, sections III.D and III.H.2, respectively. The corresponding FCC rules (47 C.F.R. §54.409(a)(2) and §54.405(e)(1), (e)(3-5)) will become effective December 2, 2016.

IV. DESIGNATION OF I-WIRELESS AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating i-wireless as an ETC would benefit low-income consumers eligible for Lifeline service in Massachusetts—the intended beneficiaries of universal service.

i-wireless' Lifeline rate plans will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of Lifeline customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without the burden of credit checks or contracts. i-wireless' proposed offer of 500 free minutes, unlimited text, and 50 megabytes of data is more generous than the current offers of other prepaid ETCs. Alternatively, customers can put money towards their account and receive unlimited calling. Moreover, i-wireless customers will have the option of a robust broadband Lifeline offering beginning December 2, 2016, which will provide 500 MB of data, unlimited text messaging and 100 voice minutes per month at no cost to the Lifeline subscriber.

i-wireless' Lifeline program will provide low-income Massachusetts residents with the convenience and security offered by wireless services, in addition to broadband services which have become essential to full participation in society—even if their financial position deteriorates. The economic circumstances indicate that low-income individuals can greatly benefit from the advantages offered by the Company's Lifeline service, thus allowing those adversely impacted by the failing economy or job loss to have access to wholly-supported wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members. It is also a commonly accepted fact that in today's market all consumers, including qualified

Lifeline customers, view the mobility and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location. Providing i-wireless with the authority necessary to offer discounted Lifeline service to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

As noted by the FCC, “the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest,” and “A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers...”²⁹ In sum, ETC designation in the Commonwealth of Massachusetts would enable i-wireless to provide the public benefits cited by the FCC, namely “increased consumer choice, high-quality service offerings, and mobility,”³⁰ as well as the safety and security of effective 911 and E911 services.³¹

Furthermore, the partnership of Sprint and i-wireless holds clear benefits for Assurance Lifeline customers. Following their transfer to i-wireless, Assurance Wireless customers will experience complete continuity of basic Lifeline service (except for the change in provider) with improved service offerings.

²⁹ See *i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, CC Docket No. 96-45, Order, FCC 10-117 (rel. June 25, 2010) ¶ 19.

³⁰ See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

³¹ See *Id.* at 3391 ¶ 23.

	Current Lifeline Plan	Following consummation of the transaction through Dec. 1, 2016	Dec. 2, 2016 and going forward
Assurance Wireless customers	350 minutes ³² + unlimited texts	500 minutes + unlimited texts + 50 MB data	Plans at or exceeding the FCC's Lifeline minimum service standards*

* Initially, the two plans (500 Minute or 500 MB Data) proposed in Section II.B herein.

Transferred Assurance Wireless customers currently receiving 350 minutes + unlimited texts will receive the i-wireless 500-minute + unlimited texts + 50 MB of data Lifeline plan effective with the closing of the transaction.³³

In the *Lifeline Modernization Order*, the FCC challenged providers to dramatically improve Lifeline service offerings. Sprint and i-wireless intend to draw upon their full combined expertise and resources to respond. The “new” i-wireless will work with Sprint to enhance the Company’s Lifeline service offerings to meet the FCC’s new voice and broadband minimum service standards.

V. CONCLUSION

Based on the foregoing Supplement and original Petition, designation of i-wireless as an ETC in the Commonwealth of Massachusetts accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

³² Recently enrolled Assurance Wireless customers (within their initial four months) are receiving 500 minutes pursuant to a promotional offering.

³³ Certain Assurance Wireless customers subscribe to and pay for enhanced Lifeline plans. These customers will be transitioned to the 500-minute plan described above, with the opportunity to purchase comparable i-wireless “top-up” services to enhance their plans.

WHEREFORE, i-wireless respectfully requests that the Department promptly designate i-wireless as an ETC in the Commonwealth of Massachusetts.

Respectfully submitted,



Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

Attorneys for i-wireless, LLC

October 18, 2016

EXHIBIT 1

Certification of John Willis, Chief Operating Officer of i-wireless, LLC

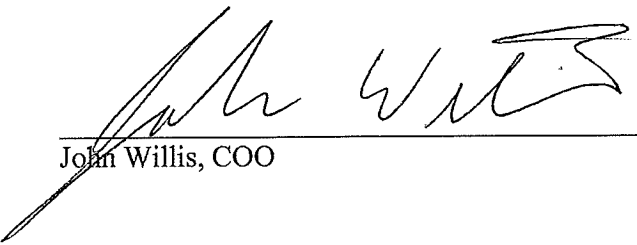
State of Kentucky)

County of Campbell)

Certification

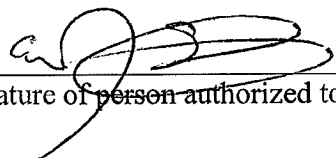
Personally appeared before the undersigned, an officer duly authorized to administer oaths, John Willis, who first being duly sworn, deposes and states that he is the Chief Operating Officer of i-wireless, LLC, and has read the foregoing Revised Supplement to Petition for Designation as an Eligible Telecommunications Carrier and knows the contents thereof, and confirms that the statements made therein are true to the best of his knowledge and belief.

Dated: 10/18/16

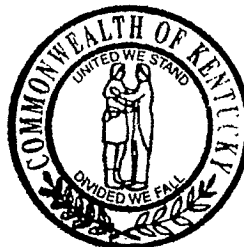

John Willis, COO

Subscribed and sworn to before me this 18 day of OCTOBER 2016.

(Notary Seal)


(Signature of person authorized to administer oath)

My Commission Expires: August 4 2019



ERIC J. SCHIMPF
Notary Public, Kentucky
State At Large
My Commission Expires
August 4, 2019
Notary ID# 539268

EXHIBIT 2

Updated Proposed Lifeline Offering

Access Wireless Lifeline Rates

Lifeline 500 Minutes Plan

500 anytime voice minutes per month

Unlimited text messages

50 megabytes (MB) of data per month

Net monthly cost to Lifeline customer: \$0

Lifeline 500 MB Data Plan

(Beginning Dec. 2, 2016)

500 MB of data per month

Unlimited text messages

100 anytime voice minutes per month

Net monthly cost to Lifeline customer: \$0

Plans include:

- Free data-capable device
- Free access to Voicemail, Caller-ID and call waiting features
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Free domestic long distance
- Data at 3G or greater speeds

Additional Airtime

Top-Up \$	Voice	Text/Pic Mail	Data MB
\$5	250	Unlim/0	250
\$10	500	Unlim/100	500
\$25	Unlimited (30 Days)	Unlim/100	1024 (1GB)
\$35	Unlimited (30 Days)	Unlim/100	2560 (2.5 GB)
\$50	Unlimited (30 Days)	Unlim/100	4096 (4 GB)

EXHIBIT 3

Updated Lifeline Application & Certification Form

MASSACHUSETTS APPLICANT INFORMATION

First Name: _____ MI: _____ Last Name: _____

Residential Address: _____ Apt/Floor/Other _____
(NO P.O. BOXES, MUST BE YOUR PRINCIPAL ADDRESS)

This address is: ☐ Permanent ☐ Temporary ☐ Multi-Household

Mailing Address: _____ Apt/Floor/Other _____

City: _____ State: _____ ZIP Code: _____

Contact Telephone Number: _____ Email Address: _____

Date of Birth: _____ Last 4-digits of Social Security Number (or full Tribal ID Number): XXX-XX-_____

I am a Tribal Resident: ☐ Yes ☐ No

QUALIFYING PROGRAM INFORMATION

Applicant must provide documented proof of participation in the program indicated below or proof of income.

- | | |
|---|---|
| <input type="checkbox"/> Federal Public Housing Assistance (FPHA)/Section 8 | <input type="checkbox"/> National School Lunch Program's Free Lunch Program (NSLP) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)/Food Stamps |
| <input type="checkbox"/> Medicaid | <input type="checkbox"/> Supplemental Security Income (SSI) |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | |

Important Information About the Lifeline Program

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by i-wireless, LLC, d/b/a Access Wireless, which is an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount may be received per household. A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive benefits from multiple providers. Violation of the one-per-household rule constitutes a violation of the FCC's rules and will result in the customer's de-enrollment from Lifeline and potentially prosecution from the United States government. Only eligible customers may enroll in the program. Consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. Customers must present proper documentation confirming eligibility for the Lifeline program. Your information will be validated against public records and any discrepancies could result in delays in your approval or rejection of service.

Activation & Usage Requirements

This service is a prepaid service and you must activate it by dialing 611 from your Access Wireless handset. To keep your account active, you must use your Lifeline service at least once during any 60-day period by completing an outbound call, purchasing additional minutes from Access Wireless, answering an inbound call from someone other than Access Wireless, or by responding to a direct contact from Access Wireless confirming that you want to continue receiving Lifeline service from them. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Access Wireless Customer Care center) subject to a 30-day cure period during which you may use the service (as described above) or contact Access Wireless to confirm that you want to continue receiving your Lifeline service from them.

- ☐ **I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements and important information on the Lifeline program.**

I hereby certify, under penalty of perjury, that: (INITIAL BY EACH LINE)

- _____ (1) I meet the income-based or program-based criteria for receiving Lifeline service and have provided documentation of eligibility if required.
- _____ (2) I will notify Access Wireless within 30 days if for any reason, I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement.
- _____ (3) I am not listed as a dependent on another person's tax return (unless over the age of 60).
- _____ (4) I attest, to the best of my knowledge, that no one in my household, including myself, is receiving a Lifeline-supported service from any other landline or wireless company such as Verizon, Safelink Wireless, or Budget Prepay.
- _____ (5) The residential address listed above is my primary residence, not a second home or business.
- _____ (6) If I move to a new address, I will provide that new address to Access Wireless within 30 days.
- _____ (7) If I provided a temporary residential address to Access Wireless, I will verify my temporary residential address as required by law.
- _____ (8) I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- _____ (9) I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits.
- _____ (10) The information included in this certification form is true and correct to the best of my knowledge.
- _____ (11) If Access Wireless finds that I am already receiving a Lifeline discount benefit from another provider, I agree that I want to transfer my Lifeline discount benefit from that Lifeline provider to Access Wireless. I understand that once the transfer is complete, I will lose my Lifeline Program benefit with any other Lifeline provider from which I am currently receiving a Lifeline discount. Access Wireless has explained to me and I understand that I may not have multiple Lifeline Program benefits with the same or different providers.
- _____ (12) I certify that the individual named on the documentation used to demonstrate program participation or income eligibility is part of my household and is not already receiving a Lifeline benefit.
- _____ (13) *If Applicable:* I reside on Federally recognized Tribal Lands.

AUTHORIZATION & CERTIFICATIONS (INITIAL BY EACH LINE)

- _____ (1) I hereby authorize Access Wireless to access any records to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize Access Wireless to release any records required for the administration of the Lifeline program, including name, telephone number, address, date of birth, Social Security Number as required by state, amount of support being sought, means of qualification for support, and dates of service initiation and termination to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- _____ (2) I understand that I have the right to enroll in the Lifeline service using non-electronic methods. I further understand that I have the right to withdraw this consent at any time prior to activation of my service. Access Wireless has advised me that I may request a paper copy of my contract and associated fees by calling 611 from my mobile handset.
- _____ (3) I consent to receive notifications, including text messages, email and phone calls (by automatic telephone dialing system, manually, or with prerecorded/artificial voice messages) from Access Wireless including, but not limited to, marketing messages, promotional offers, and informational messages on my Access Wireless cell phone number about the Wireless Rewards program with the Kroger family of stores. I acknowledge that this consent is not a condition of purchasing any property, goods, or services. I understand that messaging and data rates generally do not apply to these messages and that I may withdraw my consent to receive these messages at any time by dialing 611 from my Access Wireless cell phone. Opting out will not affect the ability of Access Wireless to contact me with messages about my Access Wireless account via manually dialed, autodialed, or pre-recorded/artificial voice calls or texts, or by email.

Mail application to:

Access Wireless
One Levee Way, Suite 3106
Newport, KY 41071

For faster processing fax to:

1-888-594-4473

You can also apply online at:

www.accesswireless.com

APPLICANT'S SIGNATURE *Please use blue or black ink*

DATE

This signed authorization is required in order to enroll you in the Lifeline Program in your state and is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by Access Wireless.

If you have any questions
CALL 1-888-450-1838


A government-funded Lifeline Assistance Program.

APPLICANT INFORMATION

First Name: _____ MI: _____ Last Name: _____

Residential Address: _____ Apt/Floor/Other _____
(NO P.O. BOXES, MUST BE YOUR PRINCIPAL ADDRESS)

This address is: ☐ Permanent ☐ Temporary ☐ Multi-Household

Mailing Address: _____ Apt/Floor/Other _____

City: _____ State: _____ ZIP Code: _____

Contact Telephone Number: _____ Email Address: _____

Date of Birth: _____ Last Four Digits of Social Security Number (or full Tribal ID Number): XXX-XX- _____

I am a Tribal Resident: ☐ Yes ☐ No

QUALIFYING INCOME ELIGIBILITY INFORMATION

You are eligible to apply if your household income is at or below 135% of the Federal Poverty Guidelines (FPG). You must submit proof of total household income for income-based qualification. Proof can include last year's income tax return, Social Security, retirement/pension, Unemployment/Workers' Compensation statement of benefits, divorce decree, child support award, three months' consecutive pay stubs, letter from employer verifying income, or other official documents containing income information. Please do not provide original documents – copies ONLY.

# of Household Members	Annual Income	Check Box that Applies
1	\$16,038	<input type="checkbox"/>
2	\$21,627	<input type="checkbox"/>
3	\$27,216	<input type="checkbox"/>
4	\$32,805	<input type="checkbox"/>
5	\$38,394	<input type="checkbox"/>
6	\$43,983	<input type="checkbox"/>
7	\$49,586	<input type="checkbox"/>
8	\$55,202	<input type="checkbox"/>

For each additional household member above 8, add \$5,616.

Important Information About the Lifeline Program

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by i-wireless, LLC, d/b/a Access Wireless, which is an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount may be received per household. A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive benefits from multiple providers. Violation of the one-per-household rule constitutes a violation of the FCC's rules and will result in the customer's de-enrollment from Lifeline and potentially prosecution from the United States government. Only eligible customers may enroll in the program. Consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. Customers must present proper documentation confirming eligibility for the Lifeline program. Your information will be validated against public records and any discrepancies could result in delays in your approval or rejection of service.

Activation & Usage Requirements

This service is a prepaid service and you must activate it by dialing 611 from your Access Wireless handset. To keep your account active, you must use your Lifeline service at least once during any 60-day period by completing an outbound call, purchasing additional minutes from Access Wireless, answering an inbound call from someone other than Access Wireless, or by responding to a direct contact from Access Wireless confirming that you want to continue receiving Lifeline service from them. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Access Wireless Customer Care center) subject to a 30-day cure period during which you may use the service (as described above) or contact Access Wireless to confirm that you want to continue receiving your Lifeline service from them.

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements and important information on the Lifeline program.

I hereby certify, under penalty of perjury, that: (INITIAL BY EACH LINE)

- _____ (1) I meet the income-based or program-based criteria for receiving Lifeline service and have provided documentation of eligibility if required.
- _____ (2) I will notify Access Wireless within 30 days if for any reason, I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement.
- _____ (3) I am not listed as a dependent on another person's tax return (unless over the age of 60).
- _____ (4) I attest, to the best of my knowledge, that no one in my household, including myself, is receiving a Lifeline-supported service from any other landline or wireless company such as Verizon, Safelink Wireless, or Budget Prepay.
- _____ (5) The residential address listed above is my primary residence, not a second home or business.
- _____ (6) If I move to a new address, I will provide that new address to Access Wireless within 30 days.
- _____ (7) If I provided a temporary residential address to Access Wireless, I will verify my temporary residential address as required by law.
- _____ (8) I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- _____ (9) I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits.
- _____ (10) The information included in this certification form is true and correct to the best of my knowledge.
- _____ (11) If Access Wireless finds that I am already receiving a Lifeline discount benefit from another provider, I agree that I want to transfer my Lifeline discount benefit from that Lifeline provider to Access Wireless. I understand that once the transfer is complete, I will lose my Lifeline Program benefit with any other Lifeline provider from which I am currently receiving a Lifeline discount. Access Wireless has explained to me and I understand that I may not have multiple Lifeline Program benefits with the same or different providers.
- _____ (12) I certify that the individual named on the documentation used to demonstrate program participation or income eligibility is part of my household and is not already receiving a Lifeline benefit.
- _____ (13) *If Applicable:* I reside on Federally recognized Tribal Lands.

AUTHORIZATION & CERTIFICATIONS (INITIAL BY EACH LINE)

- _____ (1) I hereby authorize Access Wireless to access any records to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize Access Wireless to release any records required for the administration of the Lifeline program, including name, telephone number, address, date of birth, Social Security Number as required by state, amount of support being sought, means of qualification for support, and dates of service initiation and termination to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- _____ (2) I understand that I have the right to enroll in the Lifeline service using non-electronic methods. I further understand that I have the right to withdraw this consent at any time prior to activation of my service. Access Wireless has advised me that I may request a paper copy of my contract and associated fees by calling 611 from my mobile handset.
- _____ (3) I consent to receive notifications, including text messages, email and phone calls (by automatic telephone dialing system, manually, or with prerecorded/artificial voice messages) from Access Wireless including, but not limited to, marketing messages, promotional offers, and informational messages on my Access Wireless cell phone number about the Wireless Rewards program with the Kroger family of stores. I acknowledge that this consent is not a condition of purchasing any property, goods, or services. I understand that messaging and data rates generally do not apply to these messages and that I may withdraw my consent to receive these messages at any time by dialing 611 from my Access Wireless cell phone. Opting out will not affect the ability of Access Wireless to contact me with messages about my Access Wireless account via manually dialed, autodialed, or pre-recorded/artificial voice calls or texts, or by email.

Mail application to:

Access Wireless
One Levee Way, Suite 3106
Newport, KY 41071

For faster processing fax to:
1-888-594-4473

You can also apply online at:
www.accesswireless.com

APPLICANT'S SIGNATURE *Please use blue or black ink*

DATE


This signed authorization is required in order to enroll you in the Lifeline Program in your state and is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by Access Wireless.

If you have any questions
CALL 1-888-450-1838


A government-funded Lifeline Assistance Program.

EXHIBIT 4

Updated Sample Advertisements



Free
Smartphone
+ 250 Minutes &
Unlimited Text
every month



You may qualify for Lifeline Assistance provided
by Access Wireless® if you participate in public
assistance programs such as SNAP/Food Stamps,
Medicaid or Supplemental Security Income.

To apply, visit www.accesswireless.com



A government-funded Lifeline Assistance Program.



Need More Airtime?



\$10

**250 Minutes
Unlimited Text Messaging
250 MB Data**



\$25

**500 Minutes
Unlimited Text Messaging
750 MB Data**



\$35

**Unlimited Talk for 30 days
Unlimited Text Messaging
1 GB Data**



\$50

**Unlimited Talk for 30 days
Unlimited Text Messaging
2 GB Data**

\$5

**100 Minutes
100 MB Data** *Electronic PIN;
at select stores only*

Earn FREE Wireless Rewards



You can earn FREE Wireless Rewards in the checkout line when you shop at participating Kroger-owned stores and use your Shopper's or Rewards Card. For every 100 points you earn, you'll receive a FREE Wireless Reward.**



Call 611 from your Access Wireless phone to register.

Unlimited does not mean unreasonable. Monthly Lifeline credit of 250 voice minutes and unlimited text messaging is applied on the same date each month. Unused minutes, texts, data or picture messages will automatically carry forward to the next month when a user adds a minimum of \$10 to their account within the previous 60 days or has earned a FREE Wireless Reward in the prior 45 days. If no additional funds beyond the free monthly Lifeline credit are applied to the account within 60 days or FREE Wireless Rewards have not been earned in the prior 45 days, any unused minutes, texts, data or picture mail will automatically be removed from the account balance. Expiration dates for any funds added to an Access Wireless account will adhere to the standard business rules associated with card/PIN denomination. Access Wireless users must be registered for the FREE Wireless Rewards program in order to be eligible to receive FREE Wireless Rewards. Rewards will be applied in 20-minute increments for every 100 points earned in-store on qualifying purchases. Some restrictions apply.

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by i-wireless LLC, d/b/a Access Wireless, an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount consisting of either wireline or wireless service may be received per household. A household is defined as any individual or group of individuals who live at the same address and share income and expenses. Violation of the one-per household rule constitutes violation of FCC rules and will result in the customer's de-enrollment from the Lifeline program. Consumers who willfully make false statements in order to obtain a Lifeline benefit can be punished by fine or imprisonment and can be barred from the program. Customers must present proper documentation confirming their eligibility for the Lifeline program. Customer information will be validated against public records and any discrepancies could result in delay in your approval or rejection of service.

Free phone provided by Access Wireless. Phones may vary by handset manufacturer and model and are dependent on inventory availability. Pricing listed includes domestic calling only. Access Wireless is not available in all areas. For coverage availability, visit www.accesswireless.com.

Access Wireless network services are provided on the Nationwide Sprint Network. Although Sprint provides Access Wireless subscribers usage of its network, and to its wireless services, Access Wireless is responsible for their service. For questions about Access Wireless service, visit www.accesswireless.com/support. Sprint is a trademark of Sprint Nextel.

** FREE Wireless Rewards are earned on qualifying purchases only. SNAP/food Stamp purchases may be eligible for loyalty rewards program. Access Wireless users must be registered for the FREE Wireless Rewards program in order to receive rewards. Some restrictions apply. For details on the FREE Wireless Rewards program, visit www.accesswireless.com/rewards.

FREE Lifeline Service


Available for Income-Eligible Residents

If you participate in public assistance programs or meet monthly income level guidelines, you may qualify for a free phone* + 250 Minutes & Unlimited Texts.

To apply visit www.enroll.accesswireless.com



Free phone is provided by Access Wireless. Access Wireless is a service provider for the government-funded Lifeline Assistance program. Lifeline assistance is provided by i-wireless LLC, d/b/a Access Wireless, an eligible telecommunications carrier. Lifeline service is non-transferable. Lifeline benefits are limited to one per household. A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals, who live together at the same address and share income and expenses. Violation of the one-per-household rule constitutes violation of FCC rules and will result in the customer's de-enrollment from Lifeline. Only eligible customers may enroll in the program. Consumers who willfully make false statements in order to obtain a Lifeline benefit can be punished by fine, imprisonment, or can be barred from the program. Customers must present proper documentation proving eligibility for the Lifeline program. Your information will be validated against public records and any discrepancies could result in delays or denial of service.

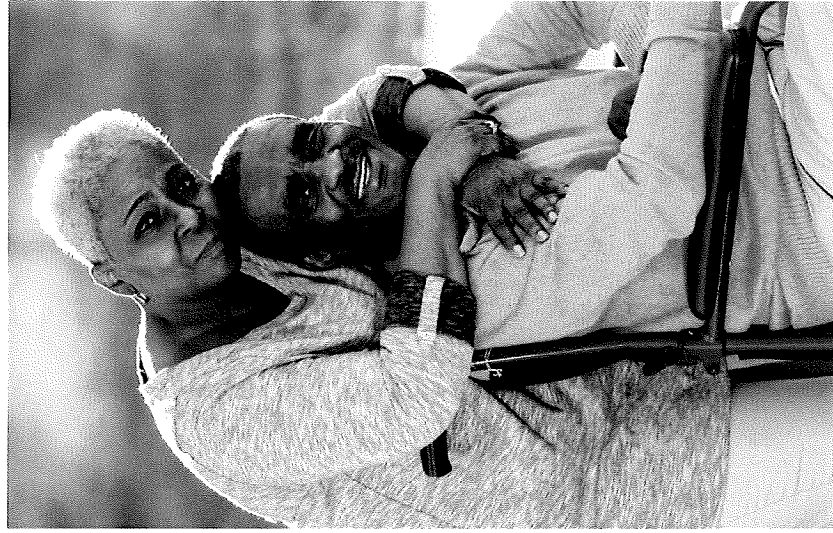
 **access
WIRELESS®**

A government-funded Lifeline Assistance Program.

What's Included?



Upon approval of your application for Lifeline service, you'll receive a free mobile phone provided by Access Wireless. On the same date each month, a free allotment of 250 minutes and unlimited text messaging will automatically be applied to your Access Wireless account.



Need More Airtime?

It's easy to add money to your account.

Purchase an Access Wireless or i-wireless airtime card at Kroger-owned stores or redeem a PIN at convenience stores nationwide. You can also use a debit or credit card to add airtime.

\$10
250 Minutes
Unlimited Text Messaging
250 MB Data

\$25
500 Minutes
Unlimited Text Messaging
750 MB Data

\$35
Unlimited Talk for 30 days
Unlimited Text Messaging
1 GB Data

\$50
Unlimited Talk for 30 days
Unlimited Text Messaging
2 GB Data

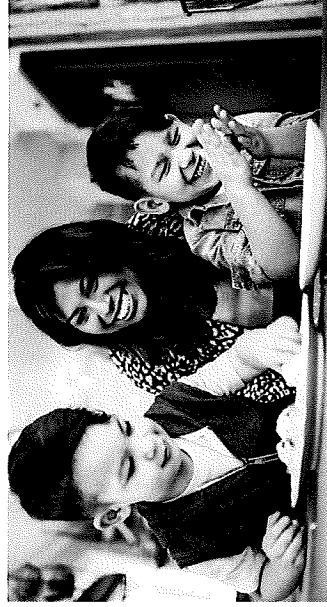
100 Minutes
\$5 100 MB Data

Electronic PIN; at select locations

Unlimited does not mean unlimited. Monthly Lifeline credit of 250 minutes and unlimited text messaging is applied on the same date each month. Unused minutes and text messages will not carry forward to the next month when a user adds a maximum of \$30 to their account within the previous 60 days or has earned a FREE Wireless Reward in the prior 45 days. If no additional funds beyond the free monthly Lifeline credit are applied to the account within 60 days of FREE Wireless Rewards have not been earned in the prior 45 days, any unused minutes, text, data or picture mail will automatically be removed from the account balance. Expiration rules for any funds added to an Access Wireless account will adhere to the standard business rules associated with each PIN denomination. Access Wireless users must be registered for the FREE Wireless Rewards program in order to receive FREE Wireless Rewards. Expired unused minutes and text messages will be applied in 30-minute increments for every 100 points earned based on qualifying purchases. Some restrictions apply.

** FREE Wireless Rewards are earned on qualifying purchases only. SNAP Food Stamp purchases may be eligible for loyalty rewards program. Access Wireless users must be registered for the FREE Wireless Rewards program in order to receive rewards. Some restrictions apply. For details on the FREE Wireless Rewards program, visit www.accesswireless.com/rewards.

Earn FREE Wireless Rewards.



You can earn FREE Wireless Rewards in the checkout line when you shop at participating Kroger-owned stores and use your Shopper's or Rewards Card. For every 100 points you earn, you'll receive a FREE Wireless Reward.**



Call 611 from your Access Wireless phone to register.

Manage Your Account 24/7.

View your account details using the **My Account** feature online at www.accesswireless.com or dial 611

directly from your Access Wireless phone. You can check your balance, add airtime, upgrade your phone or view your account activity any time day or night.



What is Access Wireless?

Access Wireless provides mobile phone service to income-eligible residents as part of the government-funded Lifeline Assistance Program.

How do I qualify?

You may automatically qualify for Access Wireless service if you participate in one of these public assistance programs:

- SNAP/Food Stamps
- Medicaid
- Supplemental Security Income (SSI)
- Temporary Assistance to Needy Families (TANF)
- Federal Public Housing Assistance (Section 8)
- Low-Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program (NSLP)
- Free School Lunch Program

You may also qualify for Access Wireless service based on your household income.

* Not the same as Social Security benefits.

To determine if
you qualify, visit
www.accesswireless.com

Important Account Information

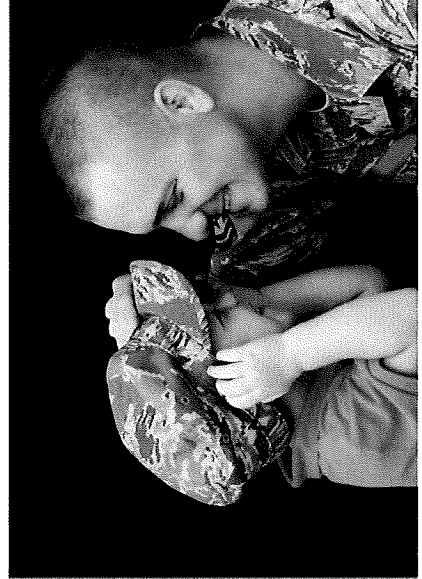
- You must use your Lifeline phone to make a phone call at least one time per month to keep your service active.
- You must annually verify your eligibility for Lifeline Assistance by completing the recertification process.
- Lifeline Assistance is limited to one benefit per household consisting of either wireline or wireless service, but not both.

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by Access Wireless, LLC, d/b/a Access Wireless, an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount consisting of either wireline or wireless service may be received per household. A household is defined as an individual or group of individuals who live at the same address, share income and expenses, maintain one or more common means of transportation, and share a common household. Access Wireless reserves the right to require customers who will participate in the program to obtain a Lifeline benefit on a limited basis and can be based from this program. Customers must present proper documentation confirming their eligibility for the Lifeline program. Customer information will be validated against public records, and any discrepancies could result in your approval or rejection of service.

Free phone provided by Access Wireless. Phones may vary by handset manufacturer and model and are dependent on inventory availability. Program funded by federal, state, and local governments. Access Wireless is not available in all areas. For coverage availability, visit www.accesswireless.com.

Access Wireless network services are provided on the nationwide Sprint Network. Although Sprint provides Access Wireless subscribers usage of the network, and to its wireless services, Access Wireless is responsible for their service. For questions about Access Wireless service, visit www.accesswireless.com/support.

Sprint is a trademark of Sprint Nextel.



Free Smartphone

+ 250 Minutes & Unlimited Text

every month

You may qualify for Lifeline Assistance provided by Access Wireless* if you participate in public assistance programs such as SNAP/Food Stamps, Medicaid or Supplemental Security Income.

To apply, visit www.accesswireless.com

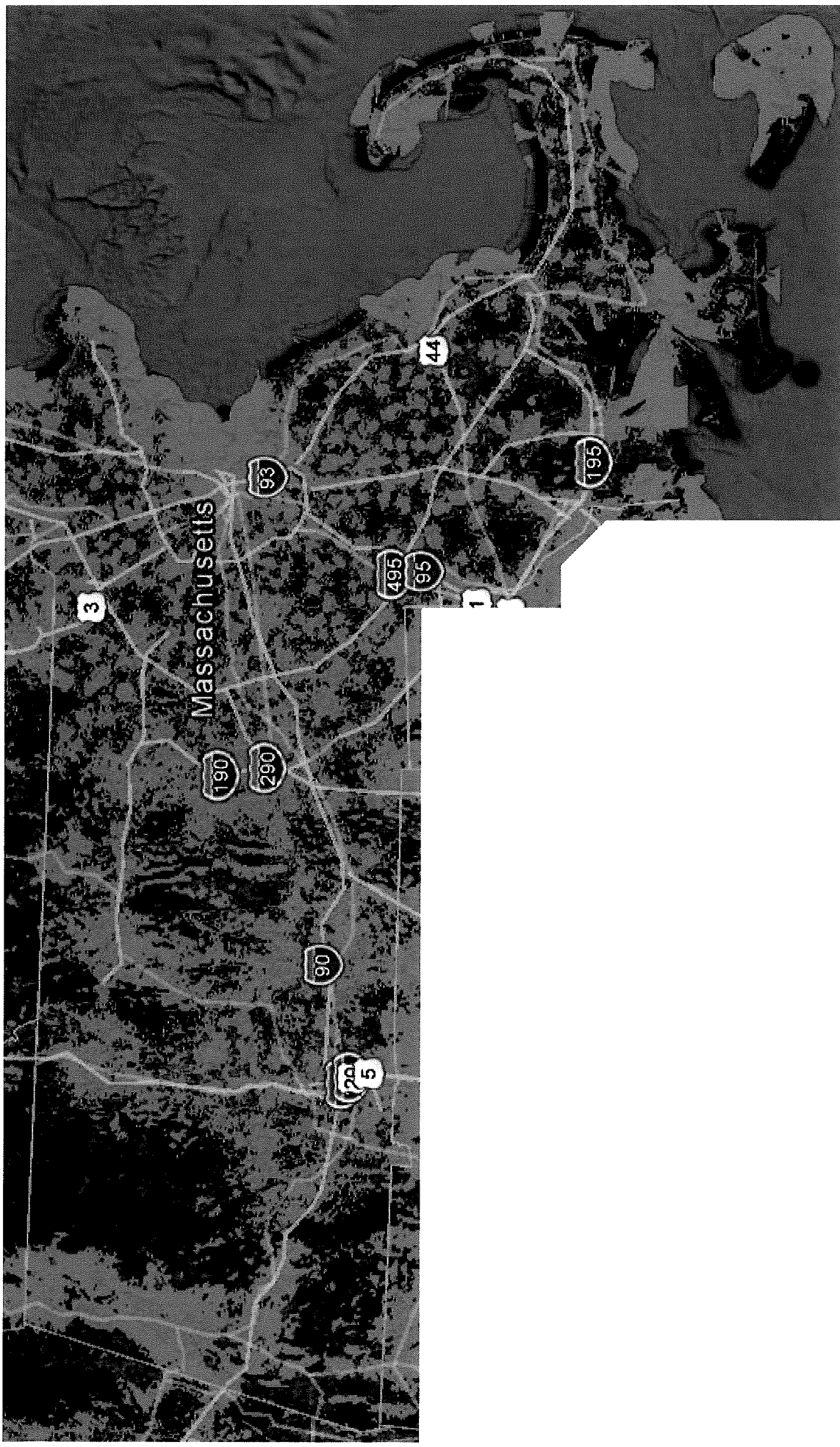


A government-funded Lifeline Assistance Program.

EXHIBIT 5

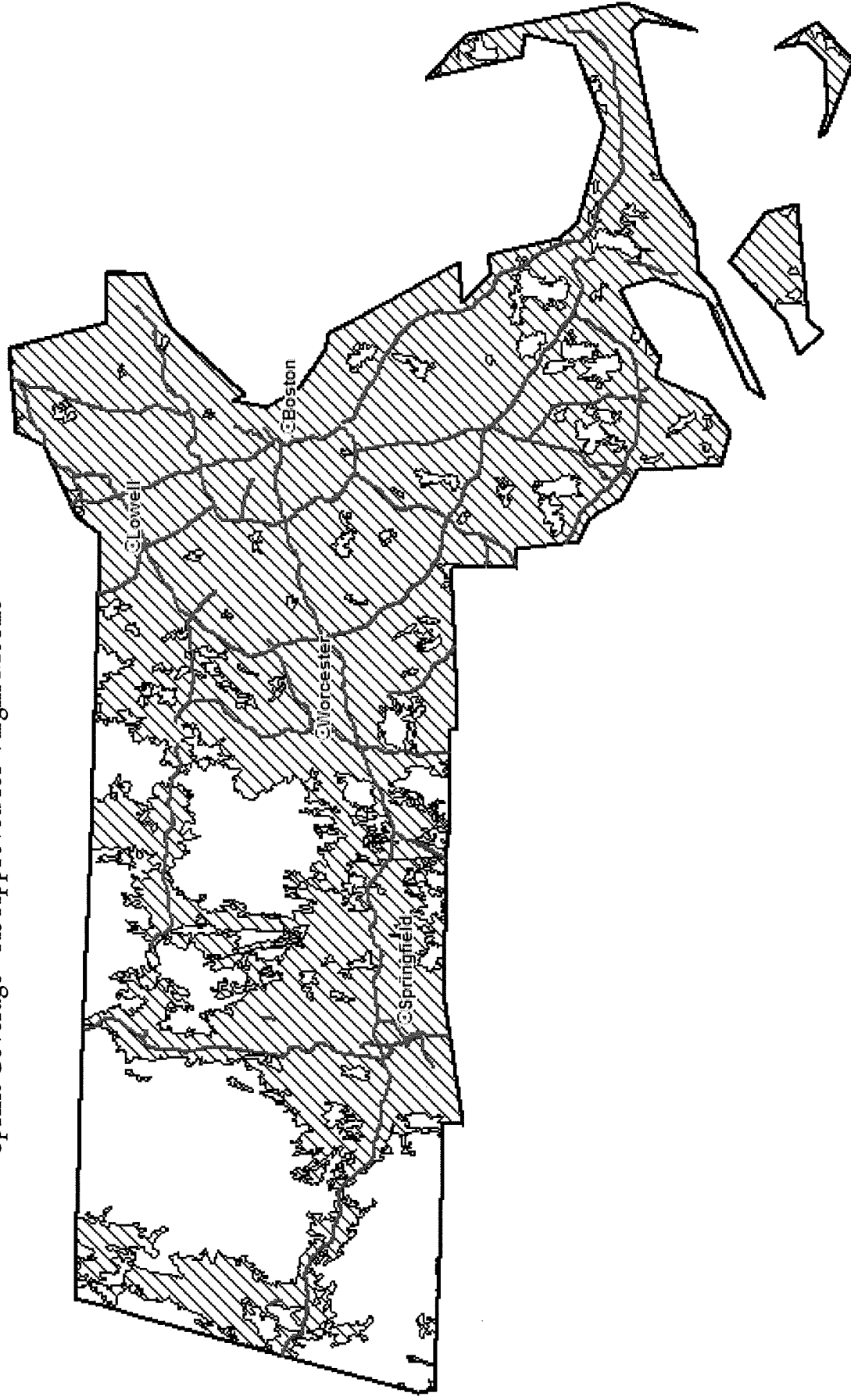
Coverage Area Map

Current Sprint Coverage



Denotes Approximate Voice Coverage

Sprint Coverage - As Approved for Virgin Mobile



Legend
— Interstate
▨ Sprint CDMA Coverage

EXHIBIT 6

Updated Wire Center List

CLLI	Carrier	RC ABBRE	LOC NAME FULL
GRNBMAXA	GRANBY TELEPHONE LLC	GRANBY	GRANBY
RCMDMAXA	RICHMOND TELEPHONE CO.	RICHMOND	RICHMOND
HNCCMAXA	TACONIC TELEPHONE CORP.	HANCOCK	HANCOCK
ACSHMAPL	VERIZON NEW ENGLAND INC.	NEWBEDFORD	ACUSHNET
ACTNMAMA	VERIZON NEW ENGLAND INC.	ACTON	ACTON
ADMSMAMA	VERIZON NEW ENGLAND INC.	ADAMS	ADAMS
AGWMMARO	VERIZON NEW ENGLAND INC.	SPRINGFLD	AGAWAM
AMHRMAFE	VERIZON NEW ENGLAND INC.	AMHERST	AMHERST
AMHRMASP	VERIZON NEW ENGLAND INC.	AMHERST	AMHERST
AMSBMAPL	VERIZON NEW ENGLAND INC.	AMESBURY	AMESBURY
ANDVMAEL	VERIZON NEW ENGLAND INC.	ANDOVER	ANDOVER
ARTNMAPL	VERIZON NEW ENGLAND INC.	ARLINGTON	ARLINGTON
ASHBMASO	VERIZON NEW ENGLAND INC.	ASHBY	ASHBY
ASHMMAPL	VERIZON NEW ENGLAND INC.	ASHBURNHAM	ASHBURNHAM
ASLDMAMA	VERIZON NEW ENGLAND INC.	FRAMINGHAM	ASHLAND
ASNTMAMA	VERIZON NEW ENGLAND INC.	ASSONET	ASSONET
ATHOMARI	VERIZON NEW ENGLAND INC.	ATHOL	ATHOL
ATLBMABA	VERIZON NEW ENGLAND INC.	ATTLEBORO	ATTLEBORO
AUBNMALG	VERIZON NEW ENGLAND INC.	AUBURN	AUBURN
AYERMAPL	VERIZON NEW ENGLAND INC.	AYER	AYER
BCKTMAWA	VERIZON NEW ENGLAND INC.	BECKET	BECKET
BDFRMAPA	VERIZON NEW ENGLAND INC.	LEXINGTON	BEDFORD
BITNMAWI	VERIZON NEW ENGLAND INC.	BRIGHTON	ALLSTON
BKLIMAGG	VERIZON NEW ENGLAND INC.	BROOKLINE	BROOKLINE
BKLIMAMA	VERIZON NEW ENGLAND INC.	BROOKLINE	BROOKLINE
BLMTMALE	VERIZON NEW ENGLAND INC.	BELMONT	BELMONT
BLNDMAGL	VERIZON NEW ENGLAND INC.	BLANDFORD	BLANDFORD
BLRCMAAN	VERIZON NEW ENGLAND INC.	BILLERICA	BILLERICA
BLTWMAJA	VERIZON NEW ENGLAND INC.	BELCHERTN	BELCHERTOWN
BMFDMAWA	VERIZON NEW ENGLAND INC.	BRIMFIELD	BRIMFIELD
BOTNMAMA	VERIZON NEW ENGLAND INC.	BOLTON	BOLTON
BRLNMAHI	VERIZON NEW ENGLAND INC.	BERLIN	BERLIN
BRNRMACH	VERIZON NEW ENGLAND INC.	BERNARDSTN	BERNARDSTON
BRNSMAMA	VERIZON NEW ENGLAND INC.	BARNSTABLE	BARNSTABLE
BRNTMAWA	VERIZON NEW ENGLAND INC.	BRAINTREE	BRAINTREE
BRPKMAWI	VERIZON NEW ENGLAND INC.	SPRINGFLD	AGAWAM
BRTNMACR	VERIZON NEW ENGLAND INC.	ROCKLAND	ABINGTON
BRWRMACH	VERIZON NEW ENGLAND INC.	BRIDGEWTR	BRIDGEWATER
BRWSMAYA	VERIZON NEW ENGLAND INC.	BREWSTER	BREWSTER
BRYVMAUN	VERIZON NEW ENGLAND INC.	BRYANTVL	BRYANTVILLE
BSRVMAST	VERIZON NEW ENGLAND INC.	DENNIS	BASS RIVER
BSTNMABE	VERIZON NEW ENGLAND INC.	BOSTON	BOSTON
BSTNMABO	VERIZON NEW ENGLAND INC.	BOSTON	BOSTON
BSTNMAFR	VERIZON NEW ENGLAND INC.	BOSTON	BOSTON
BSTNMAHA	VERIZON NEW ENGLAND INC.	BOSTON	BOSTON
BURLMABE	VERIZON NEW ENGLAND INC.	BURLINGTON	BURLINGTON

CLLI	Carrier	RC ABBRE	LOC NAME FULL
BVRLMAEL	VERIZON NEW ENGLAND INC.	BEVERLY	BEVERLY
BYTNMAMA	VERIZON NEW ENGLAND INC.	BOYLSTON	BOYLSTON
BRTNMACR	VERIZON NEW ENGLAND INC.	BROCKTON	AVON
BZBYMAPE	VERIZON NEW ENGLAND INC.	BUZZARDSBY	BOURNE
CATNMANM	VERIZON NEW ENGLAND INC.	CHARLTON	CHARLTON
CHCPMARI	VERIZON NEW ENGLAND INC.	CHICOPEE	CHICOPEE
CHCPMAWE	VERIZON NEW ENGLAND INC.	CHICOPEE	CHICOPEE
CHESMAMU	VERIZON NEW ENGLAND INC.	CHESTER	CHESTER
CHFRMANO	VERIZON NEW ENGLAND INC.	LOWELL	CHELMSFORD
CHHMAOH	VERIZON NEW ENGLAND INC.	CHATHAM	CHATHAM
CHLMMAST	VERIZON NEW ENGLAND INC.	CHILMARK	AQUINNAH
CHLSMACH	VERIZON NEW ENGLAND INC.	CHELSEA	CHELSEA
CLRNMAYA	VERIZON NEW ENGLAND INC.	COLRAIN	COLRAIN
CLTNMACH	VERIZON NEW ENGLAND INC.	CLINTON	CLINTON
CMBRMABE	VERIZON NEW ENGLAND INC.	BOSTON	BOSTON
CMBRMAWA	VERIZON NEW ENGLAND INC.	CAMBRIDGE	CAMBRIDGE
CNCRMAWA	VERIZON NEW ENGLAND INC.	CONCORD	CARLISLE
CNTNMAWA	VERIZON NEW ENGLAND INC.	CANTON	CANTON
CNWYMASH	VERIZON NEW ENGLAND INC.	CONWAY	CONWAY
CRVRMAMA	VERIZON NEW ENGLAND INC.	CARVER	CARVER
CTMTMADE	VERIZON NEW ENGLAND INC.	CATAUMET	CATAUMET
DDHMAWA	VERIZON NEW ENGLAND INC.	DEDHAM	DEDHAM
DGTNMAEL	VERIZON NEW ENGLAND INC.	DIGHTON	DIGHTON
DLTNMACA	VERIZON NEW ENGLAND INC.	DALTON	DALTON
DNNSMAYA	VERIZON NEW ENGLAND INC.	DENNIS	BASS RIVER
DNVSMAHI	VERIZON NEW ENGLAND INC.	DANVERS	DANVERS
DRCHMAAD	VERIZON NEW ENGLAND INC.	DORCHESTER	DORCHESTER
DRCTMAMM	VERIZON NEW ENGLAND INC.	LOWELL	CHELMSFORD
DXBRMACH	VERIZON NEW ENGLAND INC.	DUXBURY	DUXBURY
EBSTMASA	VERIZON NEW ENGLAND INC.	EASTBOSTON	EAST BOSTON
EBWRMABE	VERIZON NEW ENGLAND INC.	EBRIDGEWTR	EAST BRIDGEWATER
EDGLMAMA	VERIZON NEW ENGLAND INC.	E DOUGLAS	DOUGLAS
EDGRMAPP	VERIZON NEW ENGLAND INC.	EDGARTOWN	EDGARTOWN
EHMPMARA	VERIZON NEW ENGLAND INC.	EASTHAMPTN	EASTHAMPTON
ELNMMAPL	VERIZON NEW ENGLAND INC.	ELONGMEADOW	EAST LONGMEADOW
EPRVRINB	VERIZON NEW ENGLAND INC.	SEEKONK	SEEKONK
ESSXMASP	VERIZON NEW ENGLAND INC.	ESSEX	ESSEX
ESTNMANM	VERIZON NEW ENGLAND INC.	EASTON	EASTON
FKLNMAMC	VERIZON NEW ENGLAND INC.	FRANKLIN	FRANKLIN
FLMOMAMG	VERIZON NEW ENGLAND INC.	FALMOUTH	EAST FALMOUTH
FLRVMANM	VERIZON NEW ENGLAND INC.	FALL RIVER	FALL RIVER
FRMNMAUN	VERIZON NEW ENGLAND INC.	FRAMINGHAM	ASHLAND
FTBGMAMA	VERIZON NEW ENGLAND INC.	FITCHBURG	FITCHBURG
FXBOMACO	VERIZON NEW ENGLAND INC.	FOXBORO	EAST FOXBORO
GFTNMAWO	VERIZON NEW ENGLAND INC.	GRAFTON	GRAFTON
GLCSMAEL	VERIZON NEW ENGLAND INC.	GLOUCESTER	ANNISQUAM

CLLI	Carrier	RC ABBRE	LOC NAME FULL
GLVLMMAHI	VERIZON NEW ENGLAND INC.	GILBERTVL	GILBERTVILLE
GNDLMAU	VERIZON NEW ENGLAND INC.	WORCESTER	EAST MILLBURY
GNFDMACH	VERIZON NEW ENGLAND INC.	GREENFIELD	DEERFIELD
GRBRMASC	VERIZON NEW ENGLAND INC.	GREATBNGTN	ALFORD
GRNRMAWE	VERIZON NEW ENGLAND INC.	GARDNER	EAST TEMPLETON
GRTNMAHO	VERIZON NEW ENGLAND INC.	GROTON	GROTON
GRTWMAWI	VERIZON NEW ENGLAND INC.	GEORGETOWN	GEORGETOWN
GRVIMAWG	VERIZON NEW ENGLAND INC.	GRANVILLE	GRANVILLE
HBTNMAMA	VERIZON NEW ENGLAND INC.	HUBBARDSTN	HUBBARDSTON
HDSNMAFR	VERIZON NEW ENGLAND INC.	HUDSON	GLEASONDALE
HLDNMAHO	VERIZON NEW ENGLAND INC.	HOLDEN	HOLDEN
HLSTMACH	VERIZON NEW ENGLAND INC.	HOLLISTON	EAST HOLLISTON
HLYKMAMA	VERIZON NEW ENGLAND INC.	HOLYOKE	HOLYOKE
HMPDMAMA	VERIZON NEW ENGLAND INC.	HAMPDEN	HAMPDEN
HMTNMAWI	VERIZON NEW ENGLAND INC.	HAMILTON	HAMILTON
HNDLMAU	VERIZON NEW ENGLAND INC.	HINSDALE	HINSDALE
HNHMMAGR	VERIZON NEW ENGLAND INC.	HULL	ALLERTON
HNTNMAMA	VERIZON NEW ENGLAND INC.	HUNTINGTON	HUNTINGTON
HNVRMACO	VERIZON NEW ENGLAND INC.	HANOVER	EAST PEMBROKE
HPTNMAHR	VERIZON NEW ENGLAND INC.	HOPKINTON	HOPKINTON
HRVRMALI	VERIZON NEW ENGLAND INC.	HARVARD	HARVARD
HRWCMAMA	VERIZON NEW ENGLAND INC.	HARWICH	EAST HARWICH
HSTNMAMA	VERIZON NEW ENGLAND INC.	HOUSATONIC	HOUSATONIC
HTFDMACH	VERIZON NEW ENGLAND INC.	HATFIELD	HATFIELD
HVHLMAWI	VERIZON NEW ENGLAND INC.	HAVERHILL	BRADFORD
HYNSMAOC	VERIZON NEW ENGLAND INC.	HYANNIS	CENTERVILLE
HYPKMAHA	VERIZON NEW ENGLAND INC.	HYDE PARK	HYDE PARK
INORMARL	VERIZON NEW ENGLAND INC.	SPRINGFLD	AGAWAM
IPSWMACO	VERIZON NEW ENGLAND INC.	IPSWICH	IPSWICH
KGTNMASL	VERIZON NEW ENGLAND INC.	KINGSTON	KINGSTON
LCSRMAGR	VERIZON NEW ENGLAND INC.	LEICESTER	CHERRY VALLEY
LDLWMAWI	VERIZON NEW ENGLAND INC.	LUDLOW	LUDLOW
LEE MAHI	VERIZON NEW ENGLAND INC.	LEE	LEE
LENXMAWA	VERIZON NEW ENGLAND INC.	LENOX	LENOX
LGMDMALO	VERIZON NEW ENGLAND INC.	LONGMEADOW	LONGMEADOW
LMNSMASC	VERIZON NEW ENGLAND INC.	LEOMINSTER	LEOMINSTER
LNBMASC	VERIZON NEW ENGLAND INC.	LUNENBURG	LUNENBURG
LTTNMAKI	VERIZON NEW ENGLAND INC.	LITTLETON	LITTLETON
LWLLMAAP	VERIZON NEW ENGLAND INC.	LOWELL	CHELMSFORD
LWRNMACA	VERIZON NEW ENGLAND INC.	LAWRENCE	LAWRENCE
LXTNMAWA	VERIZON NEW ENGLAND INC.	LEXINGTON	BEDFORD
LYFDMACA	VERIZON NEW ENGLAND INC.	LYNNFIELD	LYNNFIELD
LYNNMACH	VERIZON NEW ENGLAND INC.	LYNN	EAST LYNN
MARNMAMI	VERIZON NEW ENGLAND INC.	MARION	MARION
MDLBMAJA	VERIZON NEW ENGLAND INC.	MIDDLEBORO	LAKEVILLE
MEFDMAPL	VERIZON NEW ENGLAND INC.	MEDFIELD	HARDING

CLLI	Carrier	RC ABBRE	LOC NAME FULL
MEWYMAVI	VERIZON NEW ENGLAND INC.	MEDWAY	MEDWAY
MLBRMAGR	VERIZON NEW ENGLAND INC.	MILLBURY	MILLBURY
MLDNMAEL	VERIZON NEW ENGLAND INC.	EVERETT	EVERETT
MLFLMACR	VERIZON NEW ENGLAND INC.	MILLERSFLS	ERVING
MLFRMAWA	VERIZON NEW ENGLAND INC.	BELLINGHAM	BELLINGHAM
MLISMAMA	VERIZON NEW ENGLAND INC.	MILLIS	MILLIS
MLTNMAAD	VERIZON NEW ENGLAND INC.	MILTON	EAST MILTON
MNCHMASU	VERIZON NEW ENGLAND INC.	MANCHESTER	BAKERS ISLAND
MNFDMABR	VERIZON NEW ENGLAND INC.	MANSFIELD	EAST MANSFIELD
MNMTMAMA	VERIZON NEW ENGLAND INC.	PLYMOUTH	MANOMET
MNSNMAMA	VERIZON NEW ENGLAND INC.	MONSON	MONSON
MRBLMAPL	VERIZON NEW ENGLAND INC.	MARBLEHEAD	MARBLEHEAD
MRBOMAMA	VERIZON NEW ENGLAND INC.	MARLBORO	CORDAVILLE
MRFDMAMA	VERIZON NEW ENGLAND INC.	MARSHFIELD	BRANT ROCK
MRMCMACE	VERIZON NEW ENGLAND INC.	MERRIMAC	MERRIMAC
MSHPMAGN	VERIZON NEW ENGLAND INC.	OSTERVILLE	COTUIT
MTAGMACE	VERIZON NEW ENGLAND INC.	MONTAGUE	LAKE PLEASANT
MTPSMAMH	VERIZON NEW ENGLAND INC.	MATTAPOSTT	MATTAPOISETT
MYNRMAWA	VERIZON NEW ENGLAND INC.	MAYNARD	MAYNARD
NADMMASU	VERIZON NEW ENGLAND INC.	NORTHADAMS	CLARKSBURG
NANDMAAA	VERIZON NEW ENGLAND INC.	LAWRENCE	LAWRENCE
NATLMAOE	VERIZON NEW ENGLAND INC.	NO ATTLEBO	ATTLEBORO FALLS
NATNMAMA	VERIZON NEW ENGLAND INC.	NORTHAMPTN	BAY STATE VILLAGE
NBFDMASM	VERIZON NEW ENGLAND INC.	NOBROOKFLD	BROOKFIELD
NBFRMAAE	VERIZON NEW ENGLAND INC.	NEWBEDFORD	ACUSHNET
NBPTMAGR	VERIZON NEW ENGLAND INC.	NEWBURYPT	BYFIELD
NCHLMAGR	VERIZON NEW ENGLAND INC.	LOWELL	CHELMSFORD
NCKTMAUN	VERIZON NEW ENGLAND INC.	NANTUCKET	NANTUCKET
NDHMMAPI	VERIZON NEW ENGLAND INC.	DOVER	DOVER
NFRMMAED	VERIZON NEW ENGLAND INC.	FRAMINGHAM	ASHLAND
NRBOMASC	VERIZON NEW ENGLAND INC.	NORTHBORO	NORTHBOROUGH
NRDGMACE	VERIZON NEW ENGLAND INC.	NO READING	NORTH READING
NRFDMAMA	VERIZON NEW ENGLAND INC.	NORTHFIELD	MOUNT HERMON
NRTNMATA	VERIZON NEW ENGLAND INC.	NORTON	BARROWSVILLE
NRWDMAVE	VERIZON NEW ENGLAND INC.	NORWOOD	NORWOOD
NRWLMAMA	VERIZON NEW ENGLAND INC.	NORWELL	ASSINIPPI
NTCKMAEC	VERIZON NEW ENGLAND INC.	NATICK	COCHITUATE
NWTNMAWA	VERIZON NEW ENGLAND INC.	NEWTON	AUBURNDALE
ORLNMAYA	VERIZON NEW ENGLAND INC.	ORLEANS	EAST ORLEANS
ORNGMASM	VERIZON NEW ENGLAND INC.	MILLERSFLS	ERVING
OSVLMAWB	VERIZON NEW ENGLAND INC.	OSTERVILLE	COTUIT
OTISMAEO	VERIZON NEW ENGLAND INC.	OTIS	OTIS
OXFRMAWH	VERIZON NEW ENGLAND INC.	OXFORD	NORTH OXFORD
PBDYMACE	VERIZON NEW ENGLAND INC.	PEABODY	PEABODY
PLMOMACO	VERIZON NEW ENGLAND INC.	PLYMOUTH	MANOMET
PLMRMAPL	VERIZON NEW ENGLAND INC.	PALMER	BONDSVILLE

CLLI	Carrier	RC ABBRE	LOC NAME FULL
PPRLMAHI	VERIZON NEW ENGLAND INC.	PEPPERELL	EAST PEPPERELL
PRTNMABO	VERIZON NEW ENGLAND INC.	PRINCETON	EAST PRINCETON
PRVNMAWI	VERIZON NEW ENGLAND INC.	PROVINCETN	NORTH TRURO
PTFDMAAA	VERIZON NEW ENGLAND INC.	PITTSFIELD	BERKSHIRE
PTFDMAFE	VERIZON NEW ENGLAND INC.	PITTSFIELD	BERKSHIRE
PTRSMAEA	VERIZON NEW ENGLAND INC.	PETERSHAM	PETERSHAM
PWTCRIHI	VERIZON NEW ENGLAND INC.	SOUTHGATE	SOUTH ATTLEBORO
QNCYMAHA	VERIZON NEW ENGLAND INC.	QUINCY	HOUGHS NECK
RCPTMAMA	VERIZON NEW ENGLAND INC.	ROCKPORT	PIGEON COVE
RDNGMALI	VERIZON NEW ENGLAND INC.	READING	READING
REVRMABE	VERIZON NEW ENGLAND INC.	REVERE	REVERE
RHBTMABA	VERIZON NEW ENGLAND INC.	REHOBOTH	REHOBOTH
RKLDMAWE	VERIZON NEW ENGLAND INC.	ROCKLAND	ABINGTON
RNDHMAME	VERIZON NEW ENGLAND INC.	RANDOLPH	HOLBROOK
ROCHMANO	VERIZON NEW ENGLAND INC.	ROCHESTER	EAST FREETOWN
RSSLMAMA	VERIZON NEW ENGLAND INC.	RUSSELL	MONTGOMERY
RTLDMAMA	VERIZON NEW ENGLAND INC.	RUTLAND	RUTLAND
RWLYMAHA	VERIZON NEW ENGLAND INC.	ROWLEY	ROWLEY
RXBRMAWA	VERIZON NEW ENGLAND INC.	ROXBURY	GROVE HALL
SAGSMACE	VERIZON NEW ENGLAND INC.	SAUGUS	SAUGUS
SALMMANO	VERIZON NEW ENGLAND INC.	SALEM	SALEM
SBDGMAMA	VERIZON NEW ENGLAND INC.	SOUTHBGD	SOUTHBRIDGE
SBTNMAEF	VERIZON NEW ENGLAND INC.	SO BOSTON	SOUTH BOSTON
SCNSMABH	VERIZON NEW ENGLAND INC.	SIASCONSET	SIASCONSET
SCTTMAFP	VERIZON NEW ENGLAND INC.	SCITUATE	EGYPT
SDBRMABP	VERIZON NEW ENGLAND INC.	SUDBURY	SUDBURY
SDFDMACO	VERIZON NEW ENGLAND INC.	SO DEERFLD	SOUTH DEERFIELD
SGMRMAYA	VERIZON NEW ENGLAND INC.	SAGAMORE	BOURNEDALE
SGTNMAWA	VERIZON NEW ENGLAND INC.	STOUGHTON	STOUGHTON
SHFDMAMA	VERIZON NEW ENGLAND INC.	SHEFFIELD	ASHLEY FALLS
SHRNMAHI	VERIZON NEW ENGLAND INC.	SHARON	SHARON
SHRWMAGR	VERIZON NEW ENGLAND INC.	SHREWSBURY	SHREWSBURY
SHRYMACH	VERIZON NEW ENGLAND INC.	SHIRLEY	NORTH SHIRLEY
SLFLMACR	VERIZON NEW ENGLAND INC.	SHELBUNFLS	EAST CHARLEMONT
SNDSMAOT	VERIZON NEW ENGLAND INC.	SANDISFLD	MONTVILLE
SOVLMACE	VERIZON NEW ENGLAND INC.	SOMERVILLE	SOMERVILLE
SPFDMAWO	VERIZON NEW ENGLAND INC.	SPRINGFLD	AGAWAM
SPNCMAME	VERIZON NEW ENGLAND INC.	SPENCER	SPENCER
STBGMAMA	VERIZON NEW ENGLAND INC.	STURBRIDGE	FISKDALE
STBRMAPI	VERIZON NEW ENGLAND INC.	STOCKBDG	GLENDALE
STNGMABR	VERIZON NEW ENGLAND INC.	STERLING	STERLING
SWCKMACO	VERIZON NEW ENGLAND INC.	SOUTHWICK	SOUTHWICK
TMTNMAME	VERIZON NEW ENGLAND INC.	TEMPLETON	BALDWINVILLE
TNTNMAPL	VERIZON NEW ENGLAND INC.	TAUNTON	BERKLEY
TPFDMACE	VERIZON NEW ENGLAND INC.	TOPSFIELD	BOXFORD
TRFLMAAA	VERIZON NEW ENGLAND INC.	TURNERSFLS	GILL

CLLI	Carrier	RC ABBRE	LOC NAME FULL
TWBYMARO	VERIZON NEW ENGLAND INC.	LOWELL	CHELMSFORD
TWNSMARA	VERIZON NEW ENGLAND INC.	TOWNSEND	TOWNSEND
TYNGMAKE	VERIZON NEW ENGLAND INC.	TYNGSBORO	DUNSTABLE
UPTNMAPI	VERIZON NEW ENGLAND INC.	UPTON	UPTON
UXBRMACO	VERIZON NEW ENGLAND INC.	UXBRIDGE	NORTH UXBRIDGE
VYHVMAED	VERIZON NEW ENGLAND INC.	VINEYRDHVN	MARTHAS VINEYARD ISLAND
WAHMMAH	VERIZON NEW ENGLAND INC.	WAREHAM	EAST WAREHAM
WAREMABA	VERIZON NEW ENGLAND INC.	WARE	WARE
WBSTMANE	VERIZON NEW ENGLAND INC.	WEBSTER	DUDLEY
WBTNMAPR	VERIZON NEW ENGLAND INC.	W BOYLSTON	OAKDALE
WHMNMAWA	VERIZON NEW ENGLAND INC.	EBRIDGEWTR	EAST BRIDGEWATER
WHVLMAPA	VERIZON NEW ENGLAND INC.	WHITINSVL	LINWOOD
WKFDMAE	VERIZON NEW ENGLAND INC.	STONEHAM	STONEHAM
WLBGMAMA	VERIZON NEW ENGLAND INC.	WILLIAMSBG	HAYDENVILLE
WLBRMAMA	VERIZON NEW ENGLAND INC.	WILBRAHAM	NORTH WILBRAHAM
WLHMMASP	VERIZON NEW ENGLAND INC.	WALTHAM	NORTH WALTHAM
WLHMMAWE	VERIZON NEW ENGLAND INC.	WALTHAM	NORTH WALTHAM
WLLFMAMA	VERIZON NEW ENGLAND INC.	WELLFLEET	SOUTH WELLFLEET
WLMGMAMA	VERIZON NEW ENGLAND INC.	WILMINGTON	WILMINGTON
WLPLMASS	VERIZON NEW ENGLAND INC.	WALPOLE	EAST WALPOLE
WLSLMALA	VERIZON NEW ENGLAND INC.	WELLESLEY	BABSON PARK
WLTWMAWA	VERIZON NEW ENGLAND INC.	WILLIAMSTN	NEW ASHFORD
WMNSMAEL	VERIZON NEW ENGLAND INC.	WESTMINSTR	WESTMINSTER
WNCHMAMA	VERIZON NEW ENGLAND INC.	WINCHESTER	WINCHESTER
WNDNMAGR	VERIZON NEW ENGLAND INC.	WINCHENDON	WATERVILLE
WNSCRICL	VERIZON NEW ENGLAND INC.	BLACKSTONE	BLACKSTONE
WNTHMAMA	VERIZON NEW ENGLAND INC.	WINTHROP	DEER ISLAND
WNWBMAMA	VERIZON NEW ENGLAND INC.	W NEWBURY	WEST NEWBURY
WPBDMAPI	VERIZON NEW ENGLAND INC.	PEABODY	PEABODY
WRCSMAE	VERIZON NEW ENGLAND INC.	WORCESTER	EAST MILLBURY
WRHMMASO	VERIZON NEW ENGLAND INC.	WRENTHAM	PONDVILLE
WRRNMAQU	VERIZON NEW ENGLAND INC.	WARREN	WARREN
WRRNRIV	VERIZON NEW ENGLAND INC.	NO SWANSEA	NORTH SWANSEA
WRXBMABE	VERIZON NEW ENGLAND INC.	JAMAICA PL	JAMAICA PLAIN
WSBGMAL	VERIZON NEW ENGLAND INC.	W STOCKBDG	WEST STOCKBRIDGE
WSBOMASU	VERIZON NEW ENGLAND INC.	WESTBORO	WESTBOROUGH
WSFDMAWA	VERIZON NEW ENGLAND INC.	WESTFIELD	WESTFIELD
WSFRMADE	VERIZON NEW ENGLAND INC.	WESTFORD	FORGE VILLAGE
WSPTMADR	VERIZON NEW ENGLAND INC.	WESTPORT	ACOAXET
WTTWMAWC	VERIZON NEW ENGLAND INC.	WATERTOWN	EAST WATERTOWN
WYLDMABP	VERIZON NEW ENGLAND INC.	WAYLAND	WAYLAND
WYMOMAMI	VERIZON NEW ENGLAND INC.	WEYMOUTH	EAST WEYMOUTH